

April 25, 2001

Mr. Steven Johnson  
Eli Lilly & Company - Clinton Labs  
P.O. Box 99  
Clinton, IN 47842

Re: **165-14056-00009**  
First Administrative Amendment to  
**SSM 165-12309-00009**

Dear Mr. Johnson:

Eli Lilly & Company has a pending Title V permit for its Clinton plant, a pharmaceutical, and animal health products manufacturing source. A letter requesting the removal of the requirement to keep records of visible emissions from Section D.2 of Significant Source Modification 165-12309-00009, issued on January 16, 2001, was received on March 12, 2001. The permit is hereby administratively amended as follows:

Condition D.2.6(a) of Significant Source Modification 165-12309-00009, requires the source to keep records of the daily visible emission notations of the carbon adsorber CA190 stack exhaust. However, there is no condition in the permit requiring that visible emissions notations be observed. Eli Lilly & Company has proposed that the visible emissions record keeping requirement has been inadvertently included in the modification approval and thus should be removed via an administrative amendment.

Upon review of the issued modification, it is determined that the visible emissions record keeping requirement (Condition D.2.6(a)) should not have been included in the modification approval. The particulate emissions from the Narasin processing operation (Section D.2), are reduced by a baghouse/filter system that has been determined to be integral to the process.

Based on this determination, no visible emissions notations are required for the Narasin operations. Since no visible emission notations are required, no records are required. Therefore, the visible emission notation record keeping requirement (Condition D.2.6) shall be removed.

The proposed change shall be processed through an Administrative Amendment in a similar manner to 326 IAC 2-7-11(a)(7) which states that changes to a monitoring, maintenance, or record keeping requirement that is not environmentally significant or an applicable requirement, is an administrative amendment.

Condition 2.6 shall be amended as follows with bold type indicating additional language and strike-out type indicating deleted information.

#### **D.2.6 Record Keeping Requirement**

- (a) ~~To document compliance with Condition D.2.1, the Permittee shall maintain records of daily visible emission notations of the carbon adsorber CA190 stack exhaust.~~

- (ba) To document compliance with Condition D.2.2, the Permittee shall maintain records of the continuous monitoring of the carbon adsorber CA190.
- (eb) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality  
Original Signed by Paul Dubenetzky

Attachments  
SDF

cc: File - Vermillion County  
U.S. EPA, Region V  
Vermillion County Health Department  
Air Compliance Section Inspector - Marc Goldman  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

## **PART 70 SOURCE MODIFICATION OFFICE OF AIR QUALITY**

**Eli Lilly and Co.  
10500 South State Road 63  
Clinton, IN 47842**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2-2 and 40 CFR 52.21 (Regulations for preventing significant deterioration of air quality); 40 CFR 124 (Procedures for decision making); and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-2; and 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: SSM 165-12309-00009	Date Issued: January 16, 2001
First Administrative Amendment No.: 165-14056-00009	Affected Page: 23
Original Signed by Paul Dubenetzky Issued By: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

## **Compliance Determination Requirements**

### **D.2.4 Performance Testing [326 IAC 2-1.1-11]**

The Permittee is not required by this permit to test for compliance with applicable requirements. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, a performance test conducted in accordance with Section C – Performance Testing.

### **D.2.5 Continuous Emissions Monitoring [326 IAC 2-1.1-11]**

To document compliance with Condition D.2.2, the Permittee shall continuously monitor the inlet and outlet VOC concentrations for carbon adsorber CA190.

### **D.2.6 Record Keeping Requirement**

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records of the continuous monitoring of the carbon adsorber CA190.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.2.7 Reporting Requirement**

A quarterly summary of excess emissions shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The summary shall include the information specified in the reporting form located at the end of this permit. This reporting requirement satisfies the requirement of C13(a).